1 KAMER ZUCKER ABBOTT Carol Davis Zucker #2543 Dare E. Heisterman #14060 3000 West Charleston Blvd., Suite 3 Las Vegas, Nevada 89102-1990 3 Tel: (702) 259-8640 Fax: (702) 259-8646 czucker@kzalaw.com dheisterman@kzalaw.com 5 6 Attorneys for Defendant Sport Clips, Inc. UNITED STATES DISTRICT COURT 7 DISTRICT OF NEVADA 8 DESTINIE MULLEN, an Individual, Case No. 2:19-cv-01992-RFB-NJK 9 Plaintiff. STIPULATION AND REQUEST FOR vs. 10 ORDER RESCHEDULING EARLY SPORT CLIPS, INC., a Foreign Corporation, NEUTRAL EVALUATION SESSION 11 DOES 1-X; and ROE CORPORATIONS 1-X, (FIRST REQUEST) Defendants. 12 13 Plaintiff Destinie Mullen ("Plaintiff"), by and through her counsel of record, the law firm of 14 HKM Employment Attorneys LLP, and Defendant Sport Clips Inc., by and through its counsel of 15 record, the law firm of Kamer Zucker Abbott, hereby stipulate and request an order rescheduling the dates of the ordered Early Neutral Evaluation ("ENE") and pre-ENE telephone conference from 16 February 28, 2020 and February 27, 2020, respectively, to April 1, 2020 and March 31, 2020. In 17 addition, the parties request that the Court extend the deadline for their respective confidential written 18 evaluation statements to be delivered to Tuesday, March 24, 2020. In support of this Stipulation and 19 Request, the parties state as follows: 20 1. By Order dated January 7, 2020, this Court scheduled an ENE for February 28, 2020 21 and a pre-ENE telephone conference for February 27, 2020. [ECF No. 11]. That Order also sets forth 22 a deadline of 4:00pm on February 20, 2020 for the submission of the parties' respective confidential 23 written evaluation statements. Id. 2. The rescheduling is requested due to Defendant's lead counsel being out of the state 24

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on the date of the ENE and on a flight on the date of the pre-ENE telephone conference.

- 3. Counsel for Defendant has conferred with Plaintiff's counsel to obtain available alternate dates for the ENE session. Following those communications, the parties have agreed to reschedule the ENE to April 1, 2020 and the pre-ENE telephone conference to March 31, 2020 at the times originally ordered pending the Court's availability and approval of the same. The parties have also agreed that their respective confidential written evaluation statements shall be delivered to the undersigned's chambers no later than 4:00 p.m. on Tuesday, March 24, 2020.
- 4. This is the first request by the parties to reschedule the ENE and is not sought for any improper purpose or other reason of delay.

WHEREFORE, the parties respectfully request that the Court reschedule the ENE to April 1, 2020 and the pre-ENE telephone conference to March 31, 2020 at the times originally ordered and similarly extend the deadline for the parties' submission of their confidential written evaluation statements to 4:00 p.m. on Tuesday, March 24, 2020

DATED this 3rd day of February, 2020.

HKM EMPLOYMENT ATTORNEYS LLP

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Attorneys for Defendant Sport Clips, Inc.

IT IS SO ORDERED.

2/4/2020

DATE

UNITED STATES MAGISTRATE JUDGE